UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:	)	
	)	Case No. 14-30058
KRISTY WIPPERMAN,	)	Chapter 13
	)	
Debtor.	)	

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Kristy Wipperman has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court
517 E. Wisconsin Avenue, Room 126
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Nathan E. DeLadurantey
DeLadurantey Law Office, LLC
735 W. Wisconsin Avenue, Suite 720
Milwaukee, WI 53233

If you or your attorney does not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is:

A. __X__ the Debtor;

B. _____ the Chapter 13 Trustee (post-confirmation modifications only);

C. _____ the holder of an unsecured claim (Name:) (post-confirmation only).

2. This is a request to modify a Chapter 13 Plan (Select A. or B.):

A. _____ post-confirmation;

B. __X__ pre-confirmation (Select i. or ii.);

i. _____ Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (L.R. 3015(b)); or

ii. __X__ Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are: Wilmington Trust Company, as Owner Trustee for Merrill Lynch Mortgage Investors Trust, Series 2007-SL1 c/o Nationstar Mortgage, LLC.

3. The Proponent wishes to modify the Chapter 13 Plan to do the following: Clarify language and add legal description concerning the avoidance of the junior lien on the debtor's homestead property upon completion of the plan.

4. The reason(s) for the modification is/are:

5. Select A. or B.

A. _____ The Chapter 13 Plan confirmed or last modified on _ is modified as follows:

B. __X__ The unconfirmed Chapter 13 Plan dated _ is modified as follows:

10. Special Provisions. Notwithstanding anything to the contrary set forth above, the Plan shall include the provisions set forth below.

Pursuant to U.S.C. §§ 506(a) and 1322(b), the junior lien on the debtor's homestead real estate held by Wilmington Trust Company, as Owner Trustee for Merrill Lynch Mortgage Investors Trust, Series 2007-SL1 shall be extinguished and shall have no further legal effect upon completion of this plan. Any claim filed by Wilmington Trust Company, as Owner Trustee for Merrill Lynch Mortgage Investors Trust, Series 2007-SL1, its servicer, successors, or assigns, shal be paid as an entirely unsecured claim. The debtor's homestead real estate commonly known as 1320 Mamerow Lane East, Oconomowoc, WI 53066 has the following legal description:

Lot 29, together with an undivided fractional interest in Outlots 1, 2, 3, 4, 5 and 6, all in Hickorywood Farms, being a part of the Northeast 1/4 and Southeast 1/4 of the Northwest 1/4 and the Northeast 1/4 of the Southwest 1/4 of Section 7, in Township 7 North, Range 17 East, in the City of Oconomowoc, Waukesha County, Wisconsin.

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

CERTIFICATION

I, Nathan E. DeLadurantey, attorney for debtor, Kristy Wipperman, certify that I have reviewed the modification proposed above with the debtor, and that the debtor has authorized me to file it with the court.

/s/ Nathan E. DeLadurantey
Counsel for the debtors

November 20, 2014
Date

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Dated: November 20, 2014.

DeLadurantey Law Office, LLC
Attorneys for Debtor

/s/
By: Nathan E. DeLadurantey
State Bar No. 1063937

Drafted by:
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